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5 **UNITED STATES DISTRICT COURT**
6 **WESTERN DISTRICT OF WASHINGTON**
7 **AT SEATTLE**

8 **ALMOG MEIR JAN,**

9 Plaintiff,

10 v.

11 **PEOPLE MEDIA PROJECT, a Washington**
12 **Non-Profit Corporation, d/b/a PALESTINE**
13 **CHRONICLE; RAMZY BAROUD; JOHN**
14 **HARVEY; and DOES 1 through 10,**

15 Defendants.

NO.

COMPLAINT

16 **I. INTRODUCTION**

17 1. On October 7, 2023, the terrorist organization Hamas brutally murdered, raped,
18 kidnapped, and butchered hundreds of Israeli civilians.

19 2. Plaintiff Almog Meir Jan is an Israeli citizen who was kidnapped and held
20 hostage for 246 days. He was rescued from the home of Abdallah Aljamal, a Hamas operative
21 and spokesperson, in a daring mission by the Israel Defense Forces (“IDF”).

22 3. However, Plaintiff’s captor, Hamas Operative Aljamal, was not just a Hamas
23 operative and spokesperson—he was a “journalist” for Defendant People Media Project d/b/a
Palestine Chronicle (“Palestine Chronicle”), a U.S.-based, tax-exempt news organization.

4. Under the leadership of Defendants, Ramzy Baroud and John Harvey,
Defendant Palestine Chronicle employed Hamas Operative Aljamal and offered him its U.S.

platform to write and disseminate Hamas propaganda, ultimately subsidized, through its status as a tax-exempt charitable organization, by U.S. taxpayers.

5. Following the Hamas terror attacks of October 7, while Hamas Operative Aljamal imprisoned Plaintiff, Defendants permitted Hamas Operative Aljamal to use their platform to whitewash Hamas's crimes and attract international support for its terrorist cause.

6. By providing this platform to Hamas Operative Aljamal and compensating Hamas Operative Aljamal for his propaganda, Defendants aided, abetted, and materially supported both Hamas Operative Aljamal and Hamas itself in their acts of terrorism, including kidnapping and holding Plaintiff hostage for 246 days, in violation of international law.

7. Accordingly, Plaintiff Almog Meir Jan brings this Complaint for damages under the Alien Tort Statute, 28 U.S.C. §1350, against Defendants People Media Project d/b/a Palestine Chronicle, Ramzy Baroud, John Harvey, and Does 1 through 10.

II. PARTIES

8. Plaintiff Almog Meir Jan is an Israeli citizen who was abducted during Hamas's October 7, 2023, attack on Israel. He was kept as a Hamas prisoner until the IDF rescued him eight months later from the home of Hamas Operative Aljamal.¹

9. Defendant People Media Project is a 501(c)(3) nonprofit corporation incorporated in the State of Washington with its principal office address at 1503 5th Avenue Southwest, Olympia, Washington, 98502-5247.

¹ According to media reports, Hamas Operative Aljamal was killed during the rescue mission. *See* Abeer Ayyoub, *The Hostages Next Door: Inside a Notable Gaza Family's Dark Secret*, WALL ST. J. (June 17, 2024), <https://www.wsj.com/world/middle-east/the-hostages-next-door-inside-a-notable-gaza-familys-dark-secret-2896f6aa>.

1 10. People Media Project operates an English language and U.S.-based news outlet,
2 under the d/b/a name, Palestine Chronicle, covering events concerning the Middle East and
3 Palestine.

4 11. Defendant Ramzy Baroud is the Editor-in-Chief of the Palestine Chronicle and
5 a Governor of People Media Project. In those positions, Defendant Baroud is ultimately
6 responsible for editorial, content, and management decisions of the Palestine Chronicle.
7 Defendant Baroud is sued in both his individual capacity and his capacity as a Governor of
8 People Media Project.

9 12. Defendant John Harvey is a Governor of People Media Project and its
10 “Principal Officer” in public IRS filings. He is also listed as “Management” on the Palestine
11 Chronicle’s website.² In those positions, Defendant Harvey is ultimately responsible for
12 management and financial decisions of the Palestine Chronicle. Defendant Harvey is sued in
13 both his individual capacity and his capacity as a Governor of People Media Project.

14 13. As of the filing of this Complaint, Plaintiff believes there are likely other
15 individuals or organizations (for profit, non-profit, or otherwise) employed by, or collaborating
16 in conjunction with, the named Defendants who committed similar tortious violations against
17 Plaintiff as the named Defendants. Therefore, Plaintiff sues these individuals and/or
18 organizations under the fictitious names of Doe Defendants 1 through 10. Following
19 investigation and further discovery, Plaintiff will seek leave of this Court to amend this
20 Complaint to allege the true names, identities, and capacities of Does 1 through 10, should this
21 information be properly ascertained.

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² *About the Palestine Chronicle*, PALESTINE CHRONICLE, <https://www.palestinechronicle.com/about/>.

III. JURISDICTION AND VENUE

14. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1350. This Complaint is brought by a foreign national who was kidnapped and injured because of torts “committed in violation of the law of nations or of a treaty of the United States.” 28 U.S.C. § 1350.

15. Venue in this district is proper under 28 U.S.C. § 1391 because the individual Defendants reside in this district and the corporate Defendant maintains its principal place of business within this district.

IV. FACTS

A. Hamas is a Designated Foreign Terrorist Organization.

16. Founded in 1987, Hamas is a terrorist group committed to destroying the State of Israel and eliminating Jewish people across the globe. Hamas seeks to achieve these objectives through any and all means, including violence and acts of terrorism.

17. The U.S. State Department designated Hamas a Foreign Terrorist Organization in October 1997, which it remains to this day.³

18. For decades, Hamas has used violence, including bombings, shootings, stabbings, and rocket attacks to advance its stated goals of destroying the State of Israel and the Jewish people.⁴

³ U.S. Dept. of State, *Foreign Terrorist Organizations*, STATE.GOV (last visited July 7, 2024), <https://www.state.gov/foreign-terrorist-organizations/>.

⁴ See generally HAMAS, THE COVENANT OF THE ISLAMIC RESISTANCE MOVEMENT (Aug. 18, 1988), https://avalon.law.yale.edu/20th_century/hamas.asp.

1 19. In addition to its violent acts of terrorism, Hamas relies on propaganda to
 2 demonize Israel, glorify the “resistance,” and cast itself and its members as victims of mythical
 3 “settler-colonial” oppressors—Israel and the Jewish people.

4 20. Propaganda abroad, particularly in western countries like the United States, is
 5 particularly important to Hamas’s strategy. Indeed, Article 29 of Hamas’s charter makes this
 6 explicit, calling on its supporters to provide Hamas “with strategic depth in all human material
 7 and informative spheres through the convening of solidarity conferences, the issuing of
 8 explanatory bulletins, favourable articles and booklets, enlightening the masses regarding the
 9 Palestinian issue, clarifying what confronts it and the conspiracies woven around it.”⁵ All of
 10 this is designed to “mobilize” Hamas’s supporters around the globe “ideologically,
 11 educationally, and culturally.”⁶

12 21. According to the Center for Strategic and International Studies, “[p]ropaganda
 13 plays a critical role for Hamas as it seeks to shore up its popularity.”⁷ This war-by-propaganda
 14 strategy “tries to paint Israel as an oppressive occupier whose military operations and policies
 15 harm Palestinians, especially innocent civilians, including children.”⁸ Hamas then “asks its
 16 audiences—fellow Palestinians, the broader Arab and Muslim communities, and the world in
 17 general—to witness Israeli aggression and the suffering of the Palestinian people and to
 18 condemn Israel and support Hamas accordingly.”⁹

21 ⁵ *Id.*

22 ⁶ *Id.*

23 ⁷ Daniel Byman & Emma McCaleb, *Understanding Hamas’s and Hezbollah’s Uses of Information Technology*,
 CTR. FOR STRATEGIC & INT’L STUDS. (July 31, 2023), <https://www.csis.org/analysis/understanding-hamass-and-hezbollahs-uses-information-technology>.

⁸ *Id.*

⁹ *Id.*

B. Defendants Have Close Ties to Hamas.

22. Even though Hamas has been a designated Foreign Terrorist Organization for more than a quarter century, Defendants maintain close ties to Hamas.

23. Defendant Baroud, in addition to his roles with the Palestine Chronicle, has served both as a non-resident scholar at the University of California-Santa Barbara's Orfalea Center for Global & International Studies and as a Senior Research Fellow at the Center for Islam and Global Affairs ("CIGA").

24. CIGA hosted a conference in 2021 that included sponsorship from Hamas- and Muslim Brotherhood-affiliated groups.¹⁰ CIGA is directed by Sami Al-Arian, who has previously been convicted of terrorism-related crimes and deported from the United States.¹¹ Al-Arian's spouse was present at pro-Palestine protests on Columbia University's campus on April 25, 2024.¹²

25. Moreover, Defendant Baroud's daughter, Zarefah Baroud—who appears to reside with Defendant Baroud—is the Digital Media Associate for American Muslims for Palestine ("AMP"), a U.S.-based nonprofit that is currently the subject of multiple lawsuits, at least one Congressional investigation, and one state attorney general investigation for allegedly providing material support to terrorist organizations, including Hamas.¹³

¹⁰ Lauren Morganbesser, *Turkish Uni. to Hold Muslim-Brotherhood, Hamas Affiliated Conference*, JERUSALEM POST (June 19, 2021), <https://www.jpost.com/middle-east/turkish-uni-to-hold-muslim-brotherhood-hamas-affiliated-conference-671344>.

¹¹ *Director's Message*, CTR. FOR ISLAM & GLOBAL AFFAIRS, <https://www.izu.edu.tr/en/ciga/about-us/director's-message>; Press Release, U.S. Dep't of Justice, Sami Al-Arian Pleads Guilty to Provide Services to Palestinian Islamic Jihad (Apr. 17, 2006), https://www.justice.gov/archive/opa/pr/2006/April/06_crm_221.html.

¹² Joe Marino, Tina Moore, & Emily Crane, *Wife of Convicted Terrorist Sami Al-Arian Was Hanging Out at Columbia Encampment Before Dramatic Raid*, N.Y. POST (May 1, 2024), <https://nypost.com/2024/05/01/us-news/wife-of-convicted-terrorist-was-at-columbia-encampment-before-raid/>.

¹³ See Complaint, *Parizer, et al. v. Nat'l Students for Just. in Palestine, et al.*, 1:24-cv-724 (E.D.V.A. May 1, 2024); Complaint, *Schnaider, et al. v. Am. Muslims for Palestine, et al.*, 8:24-cv-01067 (M.D. Fla. May 2, 2024); Letter from Rep. James Comer, Chairman, Comm. on Oversight and Accountability, House of Representatives,

26. In December 2020, Defendant Baroud participated in a webinar hosted by AMP in which he espoused familiar Hamas propaganda, including accusing Israel of ethnically cleansing Palestinians and calling for the defeat of Zionism.¹⁴

27. Defendant Baroud previously served as the Deputy Managing Editor of *Al Jazeera* online,¹⁵ a news outlet controlled by the Qatari government with close ties to Iran's Islamic Revolutionary Guard Corps and Hamas. Mr. Baroud has written for *Kayhan International*, an outlet funded by Iran's Supreme Leader.¹⁶ Iran has been designated by the U.S. State Department as a State Sponsor of Terrorism since 1984.¹⁷

28. Defendant Harvey likewise has close ties to Hamas. According to news reports, Defendant Harvey organized a campaign in 2007 to establish the Gaza Strip's Rafah neighborhood—a Hamas stronghold—as Olympia, Washington's sister city.¹⁸

and Rep. Virginia Foxx, Chairwoman, Comm. on Oversight and Accountability, House of Representatives, to Osama Abuirshaid, Executive Director, American Muslims for Palestine, at 1 (May 29, 2024), available at <https://oversight.house.gov/wp-content/uploads/2024/05/Letter-to-National-SJP-5.29.24.pdf>; Letter from Rep. James Comer, Chairman, Comm. on Oversight and Accountability, House of Representatives, and Rep. Virginia Foxx, Chairwoman, Comm. on Oversight and Accountability, House of Representatives, to Janet Yellen, Secretary, U.S. Dep't of Treasury, at 1 (May 14, 2024), available at <https://oversight.house.gov/wp-content/uploads/2024/05/Letter-to-Yellen-051424.pdf>; Letter from Rep. James Comer, Chairman, Comm. on Oversight and Accountability, House of Representatives, to Osama Abuirshaid, Executive Director, American Muslims for Palestine (June 24, 2024), available at <https://oversight.house.gov/wp-content/uploads/2024/06/AMP-Follow-Up-062424.pdf>; News Release, Jason Miyares, Attorney General of Virginia, Attorney General's Office Opens Investigation Into American Muslims for Palestine Nonprofit (Oct. 31, 2023), <https://www.oag.state.va.us/media-center/news-releases/2630-october-31-2023-attorney-generals-office-opens-investigation-into-american-muslims-for-palestine-nonprofit>.

¹⁴ American Muslims for Palestine, *6th Education Webinar | Gaza: The Soul of Palestine*, YOUTUBE (Dec. 23, 2020), <https://www.youtube.com/watch?v=R-44Wa9eKUs&t=1052s>.

¹⁵ *About Dr. Ramzy Baroud*, RAMZYBAROUD.NET, <https://ramzybaroud.net/about/>.

¹⁶ Adam Kredo, *Iran's Ties to the 'Palestine Chronicle'*, WASH. FREE BEACON (June 10, 2024), <https://freebeacon.com/national-security/irans-ties-to-the-palestine-chronicle/>.

¹⁷ U.S. Dep't of State, *Country Reports on Terrorism 2020: Iran* (last visited July 7, 2024), <https://www.state.gov/reports/country-reports-on-terrorism-2020/iran/>.

¹⁸ Kredo, *supra* note 16.

29. As the Editor-in-Chief, manager, and Governors of the Palestine Chronicle, Defendant Baroud and Defendant Harvey aligned the Palestine Chronicle's mission and content with Hamas.

C. Defendants Support Hamas by Employing Hamas Operatives and Publishing Hamas Propaganda in the United States.

30. Defendants knowingly and willfully procured and disseminated Hamas propaganda to the Palestine Chronicle's readers in the United States.

31. According to news reports, at least six Palestine Chronicle writers and contributors have been affiliated with Iranian propaganda outlets.¹⁹ As discussed above, Iran is a designated state sponsor of terrorism with known ties to Hamas.

32. In May 2019, the Palestine Chronicle began publishing articles written by Gaza-based Hamas operative and terrorist née "journalist", Abdallah Aljamal.²⁰

33. However, in addition to his position as a "journalist," Hamas Operative Aljamal also served as an official spokesperson for Hamas's Ministry of Labor.²¹

34. Hamas Operative Aljamal's position with Hamas was not a secret. He publicly appeared in Arab media as a spokesperson for the Hamas-run Ministry of Labor. ***Exhibit A.***

35. Moreover, Defendant Baroud and Hamas Operative Aljamal knew each other prior to Hamas Operative Aljamal's relationship with the Palestine Chronicle. In January 2019, Defendant Baroud and Hamas Operative Aljamal collaborated on an anti-Israel propaganda

¹⁹ Kredo, *supra* note 16.

²⁰ See *Writer: Abdallah Aljamal – Gaza*, PALESTINE CHRONICLE (last visited July 7, 2024), <https://www.palestinechronicle.com/writers/abdallah-aljamal/page/4/>.

²¹ Isabel Vincent, *Gaza Reporter Who Harbored Israeli Hostages at His Home Wrote for US-Based The Palestine Chronicle*, N.Y. POST (June 17, 2024), <https://nypost.com/2024/06/17/world-news/gaza-reporter-abdallah-aljamal-worked-for-us-non-profit/>.

1 piece published in the Qatari-government funded *Al Jazeera*.²² Defendant Baroud and Hamas
 2 Operative Aljamal are even from the same town in Gaza.²³

3 36. Accordingly, Defendants knew or should have known that Hamas Operative
 4 Aljamal was an operative and official spokesperson for Hamas.

5 37. Nevertheless, Defendants provided Hamas Operative Aljamal with support and
 6 a U.S.-based platform to publish Hamas propaganda under the guise of independent journalism
 7 and compensated Hamas Operative Aljamal for his contributions.

8 ***D. On October 7, 2023, Hamas Perpetrates the Deadliest Attack on Israel and Jews***
 9 ***Since the Holocaust.***

10 38. On October 7, 2023, Hamas led a terrorist attack in southern Israel that killed
 11 over 1,200 Israelis, took over 200 hostages, and injured over 6,900 people.²⁴

12 39. The attack began with a barrage of over 2,200 rockets directed at Israeli civilian
 13 centers. During the rocket attack, armed Hamas terrorists used motorcycles, cars, trucks, and
 14 even paragliders to storm into Israel from the Gaza strip.²⁵

15 40. Hamas terrorists marched from town to town, house to house, and car to car,
 16 slaughtering, raping, and brutalizing innocent Israeli civilians at random. Entire families,
 17 including women, children, infants, and the elderly could not escape the slaughter.

19 ²² Ramzy Baroud & Abdallah Aljamal, *Tales of Torture from Israel's Prisons*, AL JAZEERA (Jan. 22, 2019),
 20 <https://www.aljazeera.com/opinions/2019/1/22/tales-of-torture-from-israels-prisons>.

21 ²³ See Zarefah Baroud, *Two Months in the Home Israel Has Denied Me*, AL JAZEERA (Nov. 23, 2022),
 22 <https://www.aljazeera.com/opinions/2022/11/23/two-months-in-the-home-israel-has-denied-me> (explaining that
 23 Defendant Baroud grew up in Nuseirat, the same town where Hamas Operative Aljamal held Plaintiff hostage in
 his home).

²⁴ *Israel Revises Hamas Attack Death Toll to 'Around 1,200,'* REUTERS (Nov. 10, 2023),
 22 <https://www.reuters.com/world/middle-east/israel-revises-death-toll-oct-7-hamas-attack-around-1200-2023-11-10/>.

²⁵ Ibrahim Dahma et al., *Netanyahu Says Israel Is 'At War' After Hamas Launches Surprise Air and Ground Attack From Gaza*, CNN (Oct. 7, 2023), <https://www.cnn.com/2023/10/07/middleeast/sirens-israel-rocket-attack-gaza-intl-hnk/index.html>.

41. Hamas also targeted a local music festival, the Nova Music Festival, where thousands of young Israeli civilians were gathered to celebrate peace. The terrorists indiscriminately fired into the crowd, gunning down as many as 260 young civilians.²⁶ Many victims were shot in the back as they ran from their attackers.

42. Those Israelis Hamas did not murder, they took hostage. Terrorists abducted more than 240 civilians and soldiers, imprisoning them in various locations throughout the Gaza Strip. Many hostages remain in captivity today, more than nine months since they were violently ripped away from their families and homes.²⁷

43. Hamas's brutality did not stop there. During its attacks, Hamas terrorists raped, mutilated, and brutally beat Israeli women. According to the Association of Rape Crisis Centers in Israel, "rape was conducted in front of an audience, such as partners, family, or friends, to increase the pain and humiliation for all present."²⁸ Independent news organizations, like *The New York Times* and *BBC*, have verified, through tapes and first-hand accounts, that Hamas committed these heinous acts of sexual and other violence.²⁹ The U.N. Special Representative on Sexual Violence in Conflict likewise confirmed that "there are reasonable grounds to believe that conflict-related sexual violence occurred during the 7 October attacks in multiple locations across Gaza periphery, including rape and gang rape, in at least three locations."³⁰

²⁶ David Browne, Nancy Dillon, & Kory Grow, 'They Wanted to Dance in Peace. And They Got Slaughtered,' ROLLING STONE (Oct. 15, 2023), <https://www.rollingstone.com/music/music-features/hamas-israel-nova-music-festival-massacre-1234854306/>.

²⁷ *What Is Known About Israeli Hostages Taken by Hamas*, AM. JEWISH COMM. (Feb. 26, 2024), <https://www.ajc.org/news/what-is-known-about-israeli-hostages-taken-by-hamas>.

²⁸ David Gritten, *Israeli Report Says Hamas Sexual Violence 'Systematic and Intentional'*, BBC (Feb. 21, 2024), <https://www.bbc.com/news/world-middle-east-68365284>.

²⁹ *Id.*

³⁰ U.N. OFFICE OF THE SPECIAL REPRESENTATIVE OF THE SECRETARY-GENERAL ON SEXUAL VIOLENCE IN CONFLICT, *Mission Report: Official Visit of the Office of the SRSG-SVC to Israel and the Occupied West Bank*,

44. Hamas's October 7 attack is the third-deadliest terrorist attack since 1970.³¹ In terms of fatalities per capita, October 7 is far above the deadliest terrorist attack since 1970, with 1.19 fatalities per capita compared to 0.46 for the second deadliest.³² October 7 is by far the deadliest terrorist attack in Israeli history, with 1,200 fatalities compared to just 38 for the second deadliest.³³

45. Moreover, October 7 was "the deadliest day for the Jewish people since the Holocaust."³⁴

E. Plaintiff is Kidnapped, Taken to Gaza, and Abused for Eight Months by Hamas Operative and Palestine Chronicle "Journalist" Abdallah Aljamal.

46. Plaintiff was one of the Israelis kidnapped by Hamas terrorists from the Nova Music Festival on October 7.

47. For an excruciating 246 days, Hamas held Plaintiff hostage in the Gaza Strip.

48. Plaintiff ultimately wound up a prisoner of Hamas Operative and Palestine Chronicle "journalist" Aljamal, who, along with his family, abused and mistreated Plaintiff while holding Plaintiff as a hostage in their home in Nuseirat.

F. Defendants Continually Publish Propaganda from Hamas Operative Aljamal.

49. After October 7, Hamas operative Aljamal's propaganda in the Palestine Chronicle increased exponentially, often publishing two to three pieces per day, even as Hamas

29 January – 14 February 2024 ¶ 12 (Mar. 4, 2024), available at <https://www.un.org/sexualviolenceinconflict/wp-content/uploads/2024/03/report/mission-report-official-visit-of-the-office-of-the-srsg-svc-to-israel-and-the-occupied-west-bank-29-january-14-february-2024/20240304-Israel-oWB-CRSV-report.pdf>.

³¹ Daniel Byman et al., *Hamas's October 7 Attack: Visualizing the Data*, CTR. FOR STRATEGIC & INT'L STUDS. (Dec. 19, 2023), <https://www.csis.org/analysis/hamass-october-7-attack-visualizing-data>.

³² *Id.*

³³ *Id.*

³⁴ Press Release, The White House, Remarks by President Biden on the October 7th Terrorist Attacks and the Resilience of the State of Israel and its People (Oct. 18, 2023), <https://www.whitehouse.gov/briefing-room/speeches-remarks/2023/10/18/remarks-by-president-biden-on-the-october-7th-terrorist-attacks-and-the-resilience-of-the-state-of-israel-and-its-people-tel-aviv-israel/>.

operative Aljamal held Plaintiff and others hostage in violation of international law.³⁵ After all, there was now a war being fought, and propaganda and misinformation were more valuable than ever.

50. Hamas Operative Aljamal's publications follow Hamas's well-known "war-by-propaganda" strategy by attempting to exploit the international community's response to civilian casualties and blaming Israel for its reasonable response to Hamas's atrocities on October 7.

51. For example, on October 23, 2023, Defendants published a propaganda piece by Hamas Operative Aljamal calling October 7 a "daring attack" and accusing Israel of starting a "war on the Gaza population" in order "to forcefully displace Palestinians from their homeland."³⁶

52. Other pieces highlighted Palestinians killed or injured in Israel's targeted responses to Hamas's attack, including a local clown (not a euphemism) who was injured in a carefully targeted airstrike.³⁷

53. Hamas Operative Aljamal also spread Hamas's falsehoods regarding the war in Gaza. For example, when Hamas falsely claimed that it captured Israeli soldiers in Jabaliya, Hamas Operative Aljamal wrote an article repeating that false claim on Defendants'

³⁵ See PALESTINE CHRONICLE, *supra* note 20.

³⁶ Abdallah Aljamal, *'We Will Never Leave Gaza': Palestinians in the Devastated Strip are More Rooted than Ever*, PALESTINE CHRONICLE (Oct. 23, 2023), <https://www.palestinechronicle.com/we-will-never-leave-gaza-palestinians-in-the-devastated-strip-are-more-rooted-than-ever/>.

³⁷ Abdallah Aljamal, *Assassinating Joy: Nuseirat's Beloved Clown in Critical Condition, Wife and Daughter Killed*, PALESTINE CHRONICLE (Oct. 26, 2023), <https://www.palestinechronicle.com/assassinating-joy-nuseirats-beloved-clown-in-critical-condition-wife-and-daughter-killed/>.

platform.³⁸ However, there is no evidence to support Hamas's claim, and the IDF has forcefully denied, that Hamas abducted any Israeli soldiers in that instance.³⁹

54. Hamas Operative Aljamal even eulogized known Hamas terrorists. In an article published *the day before* Plaintiff was rescued from his home, Hamas Operative Aljamal accused Israel of assassinating Iyad Maghari, the mayor of Nuseirat.⁴⁰ According to one Gazan he interviewed, "Maghari was one of the best mayors we have had in years," and was "highly competent."⁴¹ Hamas Operative Aljamal's propaganda piece painted Maghari as a hero and martyr. However, Hamas Operative Aljamal failed to mention that, according to the IDF, Maghari was a terrorist "with an extensive history in Hamas."⁴²

55. Additionally, Hamas Operative Aljamal was instrumental in spreading misinformation about an Israeli airstrike that targeted a school run by the United Nations Relief and Works Agency ("UNRWA"). The strike was a precision strike targeting only three classrooms where around 30 Hamas terrorists attempted to hide from the consequences of their crimes. The strike did not target parts of the school where civilians were located, and the operation was postponed twice to avoid civilian casualties.⁴³ Nevertheless, Hamas Operative

³⁸ Abdallah Aljamal, 'Resistance Our Only Option' – Palestinians React to News of Israeli Soldiers Captured in Jabaliya, PALESTINIAN CHRONICLE (May 27, 2024), <https://www.palestinechronicle.com/resistance-our-only-option-palestinians-react-to-news-of-israeli-soldiers-captured-in-jabaliya/>.

³⁹ Nidal Al-Mughrabi, *Hamas Says it Captured Israeli Soldiers in Gaza; Israel Denies*, REUTERS (May 25, 2024), <https://www.reuters.com/world/middle-east/hamas-armed-wing-says-fighters-captured-israeli-soldiers-gaza-fighting-israeli-2024-05-25/>.

⁴⁰ Abdallah Aljamal, *Killing the Mayor of Nuseirat – Why Israel Assassinated Dr. Iyad Maghari*, PALESTINE CHRONICLE (June 7, 2024), <https://www.palestinechronicle.com/killing-the-mayor-of-nuseirat-why-israel-assassinated-dr-iyad-maghari/>.

⁴¹ *Id.*

⁴² Emanuel Fabian, *IDF: Senior Member of Hamas's General Security Forces in Rafah Killed in Airstrike*, TIMES OF ISRAEL (June 7, 2024, 9:10 P.M.), https://www.timesofisrael.com/liveblog_entry/idf-senior-member-of-hamass-general-security-forces-in-rafah-killed-in-airstrike/.

⁴³ It is important to note that the placement of military forces in schools itself violates internationally recognized laws of armed conflict. See GLOBAL COALITION TO PROTECT EDUCATION FROM ATTACK, Guidelines for Protecting Schools and Universities from Military Use During Armed Conflict (Dec. 2014) (endorsed by 120 states), available at https://protectingeducation.org/wp-content/uploads/documents/documents_guidelines_en.pdf.

1 Aljamal called the attack a “gruesome massacre” and accused Israel of “targeting displaced
2 civilians.”⁴⁴

3 56. For the more than eight months Hamas held Plaintiff hostage and during the
4 time Hamas Operative Aljamal imprisoned Plaintiff in his home, Defendants permitted Hamas
5 Operative Aljamal to use their platform—and paid him to do so—to whitewash Hamas’s
6 crimes and attract international support for its terrorist cause.

7 57. Most disturbingly, because of the Palestine Chronicle’s tax-exempt status,
8 Hamas Operative Aljamal’s propaganda, as well as his hostage-taking, was actually subsidized
9 by U.S. taxpayers.

10 ***G. Plaintiff is Rescued, and Defendants Attempt to Distance Themselves from Hamas***
11 ***Operative Aljamal.***

12 58. On June 8, 2024, after 246 days in Hamas’s captivity, Plaintiff, along with two
13 other hostages, was rescued from Hamas Operative Aljamal’s home in a daring commando-
14 style mission conducted by the IDF in conjunction with several international intelligence
15 agencies.⁴⁵

16 59. Hamas Operative Aljamal was killed when he and his family attempted to
17 violently resist IDF forces to prevent Plaintiff’s rescue.

18 60. Once Hamas Operative Aljamal’s name and identity appeared in the news,
19 Defendants attempted to minimize their connection to Plaintiff’s captor.

21 ⁴⁴ Abdallah Aljamal, *Smoke and Shrapnel – The Palestine Chronicle Interviews Survivors from Nuseirat School*
22 *Massacre*, PALESTINE CHRONICLE (June 6, 2024), <https://www.palestinechronicle.com/smoke-and-shrapnel-the-palestine-chronicle-interviews-survivors-from-nuseirat-school-massacre/>.

23 ⁴⁵ Staff, *After 8 Months of Captivity, Almog Meir Jan Rescued by IDF From Central Gaza*, TIMES OF ISRAEL (June 8, 2024), <https://www.timesofisrael.com/taken-captive-almog-meir-jan-21-cared-for-his-grandfather-before-the-rave/>.

1 61. For instance, at 6:45 a.m. on June 9, 2024, the Palestine Chronicle listed Hamas
2 Operative Aljamal as a “correspondent for The Palestine Chronicle.” *Exhibit B*. Within hours,
3 Defendants changed Hamas Operative Aljamal’s position to “contributor.” *Exhibit C*.

4 62. Defendants then released a statement referring to Hamas Operative Aljamal as
5 a “freelance contributor” who wrote for the Palestine Chronicle “on a voluntary basis.” *Exhibit*
6 *D*.

7 63. However, this statement fails to explain why, when Hamas Operative Aljamal
8 interviewed sources for his propaganda pieces, Defendants took credit for his work, stating,
9 “*The Palestine Chronicle* spoke to Palestinians on the ground.”⁴⁶

10 64. Regardless of his employment status, it is indisputable that Defendants
11 provided Hamas Operative Aljamal, whose connections to Hamas were publicly known, with
12 a U.S.-based and taxpayer subsidized platform to publish Hamas propaganda and to pass the
13 material off as independent journalism.

14 65. Moreover, the compensation Defendants paid Hamas Operative Aljamal for his
15 propaganda directly enabled him to imprison Plaintiff in his home.

16 66. As a result of Defendants’ aiding, abetting, and materially supporting a known
17 Hamas operative and propagandist, Plaintiff suffered physical injuries, severe mental anguish,
18 and extreme emotional pain and suffering.

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⁴⁶ *E.g.*, Aljamal, *supra* note 36 (emphasis added).

V. FIRST CLAIM FOR RELIEF:
VIOLATION OF THE ALIEN TORT STATUTE, 28 U.S.C. § 1350 –
AIDING AND ABETTING KIDNAPPING AND IMPRISONING CIVILIAN
HOSTAGES IN VIOLATION OF THE “LAW OF NATIONS” –
Against All Defendants

67. Plaintiff realleges and reincorporates paragraphs 1–66 as if restated fully.

68. The Alien Tort Statute states that “[t]he district courts shall have original jurisdiction of any civil action by an alien for a tort only, committed in violation of the law of nations or a treaty of the United States.” 28 U.S.C. § 1350.

69. Plaintiff is an Israeli citizen and is therefore an alien under the Alien Tort Statute.

70. International law universally prohibits kidnapping and imprisoning civilian hostages. Article 34 of the Fourth Geneva Convention prohibits the taking of hostages.⁴⁷ Additionally, the Rome Statute of the International Criminal Court (“Rome Statute”), an international treaty adopted in 1998 and signed by 123 countries, states that the taking of hostages is a war crime.⁴⁸

71. Defendant’s activities also violated Article 2.1(b) of the International Convention for the Suppression of the Financing of Terrorism which provides:

Any person commits an offence within the meaning of this Convention if that person by any means, directly or indirectly, unlawfully and willfully, provides or collects funds with the intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out:

An act which constitutes an offence within the scope of and as defined in one of the treaties listed in the annex; or

⁴⁷ IV Geneva Convention Relative to the Protection of Civilian Persons in Time of War art. 34 (Aug. 12, 1949), available at https://www.un.org/en/genocideprevention/documents/atrocities-crimes/Doc.33_GC-IV-EN.pdf.

⁴⁸ Rome Statute of the International Criminal Court art. 8(2)(a)(viii) (July 17, 1998), available at <https://www.icc-cpi.int/sites/default/files/2024-05/Rome-Statute-eng.pdf>.

Any other act intended to cause death or serious bodily injury to a civilian, or to any other person not taking an active part in the hostilities in a situation of armed conflict, when the purpose of such act, by its nature or context, is to intimidate a population, or to compel a government or an international organization to do or to abstain from doing any act.

72. Moreover, “aiding and abetting liability is a norm of customary international law with sufficient definition and universality to establish liability under the” Alien Tort Statute. *Doe v. Cisco Sys.*, 73 F.4th 700, 717 (9th Cir. 2023).

73. Defendants knew or should have known that Hamas Operative Aljamal was a Hamas operative and spokesperson.

74. Yet, Defendants employed Hamas Operative Aljamal as a “journalist,” provided him with a U.S.-based and taxpayer subsidized platform to publish Hamas’s propaganda to a vast U.S.-based audience, and compensated Hamas Operative Aljamal for his propaganda.

75. Furthermore, Defendants knowingly provided Hamas Operative Aljamal with a “legitimate” title, thereby giving him cover to commit heinous acts.

76. By providing this support to Hamas Operative Aljamal, including compensating Hamas Operative Aljamal for his propaganda, Defendants aided and abetted Hamas Operative Aljamal in cooperating in the kidnapping of Plaintiff and imprisoning Plaintiff as a hostage in his home, in violation of international law.

77. As a result of Defendants’ aiding and abetting a known Hamas operative and propagandist, Plaintiff suffered physical injuries, severe mental anguish, and extreme emotional pain and suffering.

VI. SECOND CLAIM FOR RELIEF:
VIOLATION OF THE ALIEN TORT STATUTE, 28 U.S.C. § 1350 –
AIDING AND ABETTING TERRORISM IN VIOLATION OF THE “LAW OF
NATIONS” –
Against All Defendants

78. Plaintiff realleges and reincorporates paragraphs 1–77 as if restated fully.

79. The Alien Tort Statute states that “[t]he district courts shall have original jurisdiction of any civil action by an alien for a tort only, committed in violation of the law of nations or a treaty of the United States.” 28 U.S.C. § 1350.

80. Plaintiff is an Israeli citizen and is therefore an alien under the Alien Tort Statute.

81. International law universally prohibits acts of terrorism such as those Hamas perpetrated on October 7. For example, since the Nuremberg trials and the aftermath of World War II, it has been universally recognized that it is unacceptable to murder, rape, torture, imprison, deport, enslave, or exterminate a civilian population.⁴⁹ The Nuremberg trials also recognized that persecution based on political, racial or religious reasons violated international law.⁵⁰

82. Additionally, the Rome Statute prohibits certain crimes against humanity that are committed against a civilian population in a systematic way, including murder, extermination, enslavement, deportation or forcible transfer of population, torture, rape, and persecution against an identifiable group.⁵¹

⁴⁹ Nuremberg Control Council Law No. 10, art. II, § 1(b)–(d), available at <https://avalon.law.yale.edu/imt/imt10.asp>.

⁵⁰ *Id.* § 1(c).

⁵¹ Rome Statute, *supra* note 48, at art. 7.

83. International law likewise universally prohibits the material support of terrorism. Article 2.1(b) of the International Convention for the Suppression of the Financing of Terrorism prohibits any person from “by any means, directly or indirectly, unlawfully and willfully, provid[ing] or collect[ing] funds with the intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out” any “act intended to cause death or serious bodily injury to a civilian . . . when the purpose of such act, by its nature or context, is to intimidate a population, or to compel a government or an international organization to do or to abstain from doing any act.”⁵² Over 130 countries, including the United States, have signed this Convention.

84. Moreover, “aiding and abetting liability is a norm of customary international law with sufficient definition and universality to establish liability under the” Alien Tort Statute. *Doe*, 73 F.4th at 717.

85. Defendants knew or should have known that Hamas Operative Aljamal was a Hamas operative and spokesperson.

86. Yet, Defendants employed Hamas Operative Aljamal as a “journalist,” provided him with a U.S.-based and taxpayer subsidized platform to publish Hamas’s propaganda to a vast U.S.-based audience, and compensated Hamas Operative Aljamal for his propaganda.

87. Furthermore, Defendants knowingly provided Hamas Operative Aljamal with a “legitimate” title, thereby giving him cover to commit heinous acts.

⁵² International Convention for the Suppression of the Financing of Terrorism art. 2.1(b), Dec. 9, 1999, 2178 U.N.T.S. 197, available at https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtldsg_no=XVIII-11&chapter=18&clang=en.

88. By providing this support to Hamas Operative Aljamal, including compensating Hamas Operative Aljamal for his propaganda, Defendants aided and abetted Hamas's acts of terrorism on October 7 and after, including its efforts to demonize Israel and exploit the international community's response to the war in Gaza to sway public opinion in its favor, in violation of international law.

89. Additionally, by providing this support to Hamas Operative Aljamal, including compensating Hamas Operative Aljamal for his propaganda, Defendants materially supported Hamas, a designated foreign terrorist organization, in violation of international law.

90. As a result of Defendants' aiding, abetting, and materially supporting a known Hamas operative and propagandist, Plaintiff suffered physical injuries, severe mental anguish, and extreme emotional pain and suffering.

Prayer for Relief

Accordingly, Plaintiff respectfully asks this Court to:

A. Find that the acts and omissions herein stated existed;

B. Declare Defendants violated the Alien Tort Statute, 28 U.S.C. § 1350 as set forth in the First & Second Claims for Relief, *supra*;

C. Enter judgment against Defendants and in favor of Plaintiff for compensatory damages in amounts to be determined at trial;

D. Award Plaintiff punitive damages in an amount sufficient to punish Defendants and to deter similar conduct in the future;

E. For pre and post-judgment interest where applicable in favor of Plaintiff;

F. For an award of all of Plaintiff's costs, expenses, and attorneys' fees as permitted by any agreement, statute or grounded in equity;

1 G. Grant such other and further relief as justice and equity requires.

2 DATED this 9th day of July 2024.

3 Respectfully submitted,
4 TOMLINSON BOMSZTYK RUSS

5 

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Exhibit A

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Exhibit B



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Writer: Abdallah Aljamal - Gaza



– Abdallah Aljamal is a Gaza-based journalist. He is a correspondent for The Palestine Chronicle in the Gaza Strip. His email is abdallahaljamal1987@gmail.com

Exhibit C



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Writer: Abdallah Aljamal - Gaza



– Abdallah Aljamal is a Gaza-based journalist. He is a contributor for The Palestine Chronicle from the Gaza Strip. His email is abdallahaljamal1987@gmail.com

Exhibit D

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Abdallah Aljamal (1987-2024) – Well-Known Journalist Murdered in Gaza

🕒 June 9, 2024 📁 Blog, News

THE GAZA GENOCIDE



37084

Killed



84494

Wounded



11000

Missing



Palestinian journalist Abdallah Aljamal. (Photo: supplied)

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By **Palestine Chronicle Staff** X

The Palestine Chronicle is saddened to learn that Abdallah Aljamal, one of its contributors in the Gaza Strip, has been killed in the latest Israeli massacre in the Nuseirat refugee camp.

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LATEST POSTS



'Fatal Strategic Decisions' – Gantz, Eisenkot Resign from Israeli War Cabinet

Particularly tragic is that Aljamal's last contribution to the Palestine Chronicle covered a previous massacre, which killed over 40 Palestinian civilians in an UNRWA school in the refugee camp.

Israeli media is linking Aljamal's family to the Israeli captives, claiming that Abdallah's father, Dr. Ahmed, and other members of the family, were executed in the process of the bloody rescue mission.

Those claims have been refuted by respected commentators and journalists online, who pointed in the inconsistencies in the official Israeli narrative.

"The building where Abdallah lived was one of 7 homes reportedly raided by the IDF on June 8. Hostages were held in only 2 of these buildings, not yet clear which," Gazan writer and analyst Muhammad Shehada wrote on X.



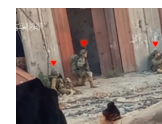
Abdallah Aljamal (1987-2024) – Well-Known Journalist Murdered in Gaza



Israel Has Been Added To The UN Blacklist – What Does It Mean?



'Lost Moral Credibility' – UN Official Slams Bias of Countries Over Gaza Genocide



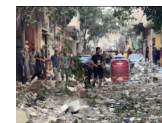
Israeli Soldier Commits Suicide after Receiving Orders to Return to Gaza



Israeli Forces Detain 22 Palestinians, Youth Dies of Injuries – West Bank Update




Details Emerge – Inside the Three-Stage Plan for Ceasefire Agreement



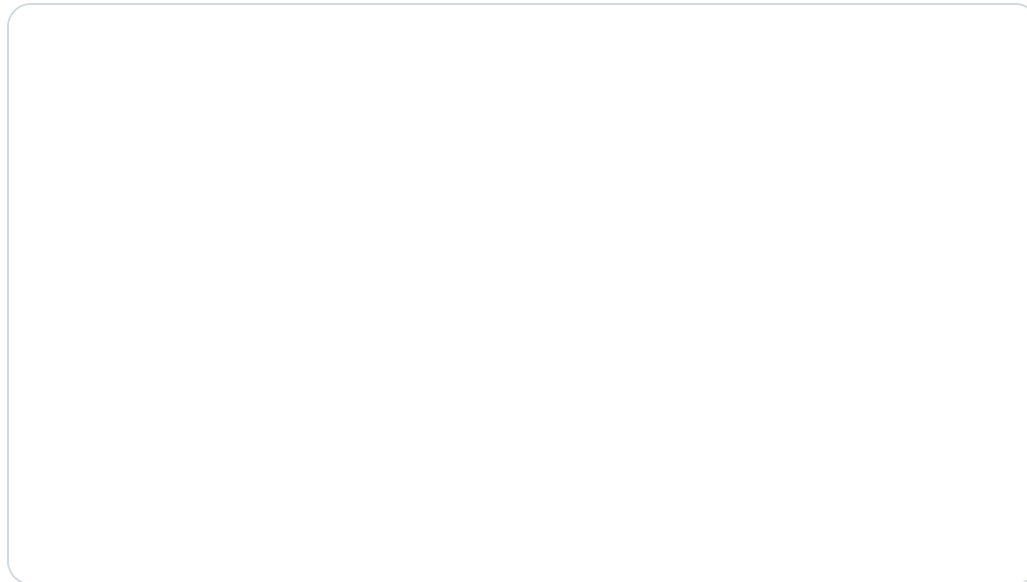
GAZA LIVE BLOG: Nuseirat Massacre Death Toll Grows | Israel's War Council

Muhammad Shehada ✓@muhammadshehad2 · [Follow](#)

 Debunking the false claim that Abdallah Aljamal kept an Israeli hostage in his home:

1- Abdallah lived in an apartment in a multi-storey building. No connection was ever provided by the IDF between him & the hostage.

2- The building where Abdallah lived was one of 7 homes... [Show more](#)



12:12 PM · Jun 9, 2024



3.4K



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247



What are Hamas' Options after Gaza Massacre, Freeing of Four Captives? – Analysis



The Battle of Nuseirat – Resistance Roundup – Day 246



The tragic news of Aljamal's family execution was conveyed through EuroMed Monitor, a Geneva-based rights organization.

"In a preliminary investigation into the field executions by the Israeli army at the Nusseirat refugee camp yesterday, @EuroMedHR stated that soldiers used a ladder to break through the residence of Dr. Ahmed Al-Jamal," the statement said.

"Upon encountering 36-year-old Fatima Al-Jamal on the staircase, they immediately shot her dead. The troops then stormed the house and executed her husband, 36-year-old journalist Abdullah Al-Jamal, and his father, 74-year-old Dr. Ahmed Al-Jamal, in front of his grandchildren. Additionally, their 27-year-old daughter, Zainab, was shot and seriously injured," it added.

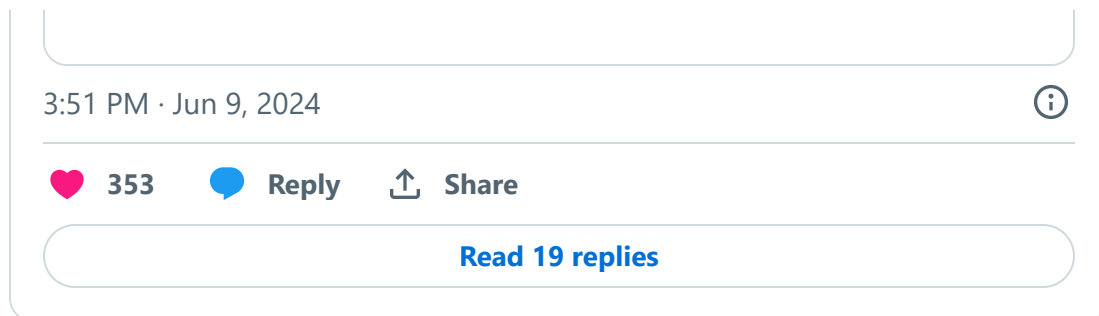
Ramy Abdu | رامي عيده ✓

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This article from Yedioth Ahronoth @YediotAhronot exemplifies the Israeli media saturated with lies.

-The article used my tweet, which talks about executions in the al-Jamal house, and distorted it to claim that the hostage Argamani was there, despite me never mentioning such a... [Show more](#)



The Israeli mission, which according to Axios and other news outlets, involved direct and indirect US and British support, resulted in the killing of 274 Palestinians and the wounding of hundreds more.

“Abdallah Aljamal’s reports have focused entirely on the humanitarian situation in Gaza, especially in the central part of the Strip, starting shortly after the war,” The Palestine Chronicle said in a statement.

“His contributions became frequent when Israel deliberately began killing journalists, making it nearly impossible for the Palestinian voice to break away from the Gaza siege,” it added.

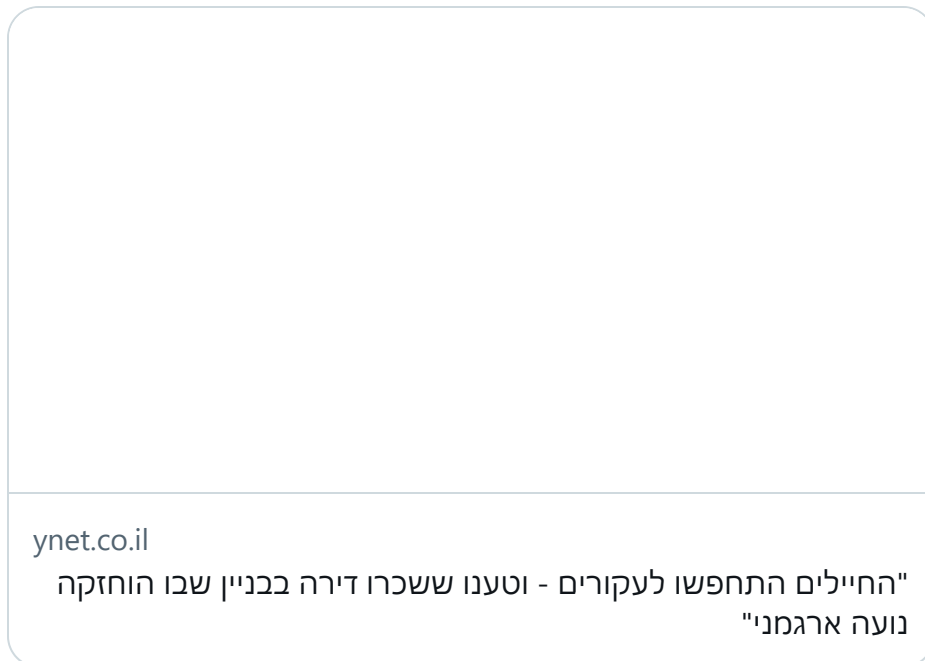
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"החייילים התחפשו לעקורים - וטענו ששכרו דירה בבניין שבו הוחזקה
נועה ארגמני"

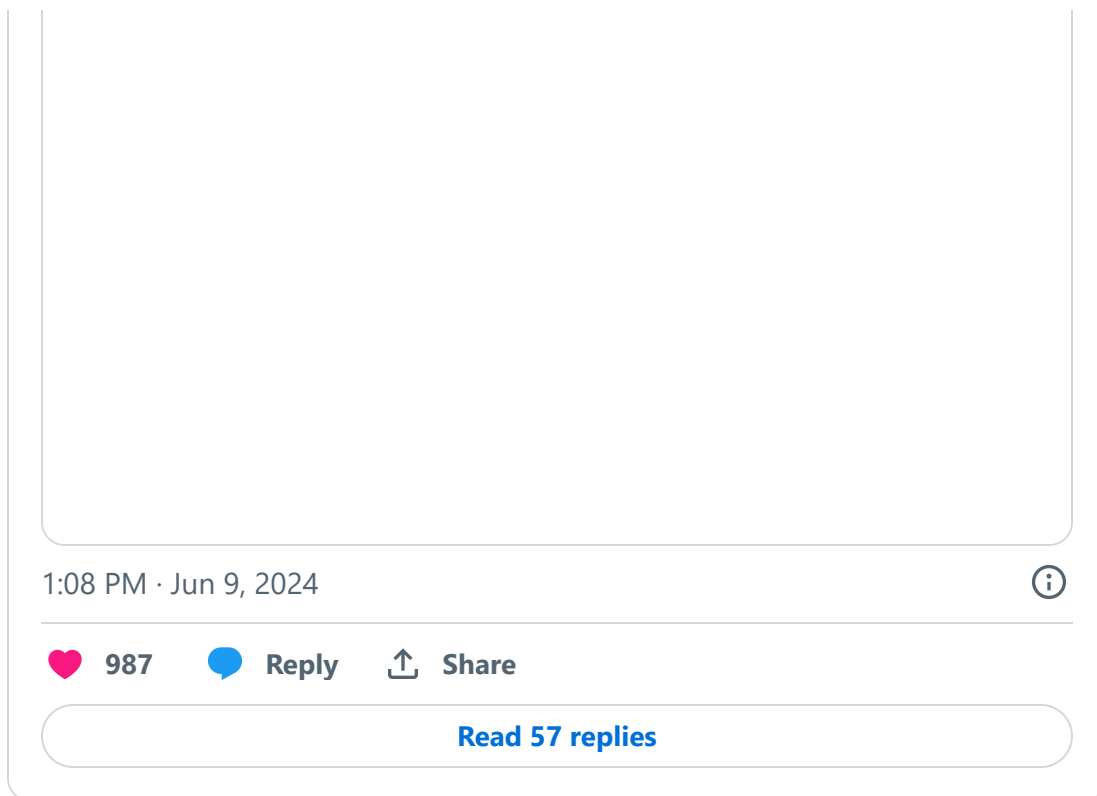
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The IDF now claims it was NOT Noa Argamani in the building where Abdallah lived but the 3 male hostages.

This raises the likelihood that he didn't know, b/c he lived on the 1st floor & the hostages were kept on the 3rd in an apartment building.

Calling him a " Hamas operative"... [Show more](#)



Aljamal's relationship with the Palestine Chronicle was that of a freelance contributor. He was neither a staff writer nor a contractor. Aljamal has contributed his services to the Palestine Chronicle on a voluntary basis.

However, the value of his work was very important as one of the few journalists who kept the focus entirely on displaced Palestinian refugees, families of victims of the Israeli genocide, and other stories that were not being told by other journalists or media outlets.

Abdallah's daily reports were originally written and published in Arabic. The Palestine Chronicle translated and republished a selected number of these reports throughout the war.

The Palestine Chronicle conveys its condolences to the people of Nuseirat and all the families of journalists murdered in Gaza throughout this genocidal war.

For more information about Abdallah Aljama's translated and republished articles, click [here](#).

(The Palestine Chronicle)



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